



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

May 14, 2007

Ms. Lynne Woodside
Supervisor, Environmental Affairs
NGK Metals Corporation
917 US Highway 11
South Sweetwater, TN 37874

Re: Corrective Action Implementation

Dear Ms. Woodside:

This letter is a follow up of the meeting on April 30, 2007 where EPA provided initial comments on "The NGK off-site Investigation Summary and Conclusions" Report (March 21, 2007). The groundwater sampling data documented the current distribution of total beryllium, chromium, and fluoride in on-site and off-site wells at the NGK Metals Corporation in Muhlenberg Township, PA.

Following are EPA's final comments on the "NGK Off-site Investigation Summary and Conclusions" (March 21, 2007) and the E-Mail proposal from Marilyn Hewitt on behalf of NGK (April 16, 2007) for the installation of pressure transducers in select wells:

- Well SW-15 shows variable and generally increasing dissolved concentrations of Beryllium from December 1989 (0.36 mg/L) to December 2006 (3.31 mg/L), and has a higher Beryllium concentration than any other well. The source for this Beryllium is not obvious - a former retention basin was located nearby, but appears to be hydraulically downgradient of well SW-15. Wells SW-21 and SW-22 (approximately 200 feet south and west) have never been sampled. In order to help determine the likely source area and the potential off-site migration in the shallow groundwater, these wells should be sampled and an additional shallow well should be installed in the vicinity of DW-28. This work will provide information that will assist us in determining if off-site migration is a concern on the northeast corner of the property.
- Page 3, Scope of Work, second bullet - access was not granted for the off-site groundwater monitoring well northwest of the site (cemetery). NGK should investigate the possibility of gaining access to property along Rt. 61 north of Tuckerton Rd. (west of the cemetery) for well installation. In addition, NGK should verify that there are no users of groundwater in that area (the previous well survey conducted during the RFI may cover this area).



The facility can proceed with a groundwater treatment facility shut down. If you have any questions, please feel free to contact me at 215-814-3415 or e-mail to: ioff.vickie@epa.gov.

Sincerely,

 5-14-07

Victoria Ioff,
Remedial Project Manager
Pennsylvania Operations Branch (3WC22)
Waste and Chemical Management Division
